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ANGELA D. LIPSMAN (NY; NJ)

May 7, 2024

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Cheema et al,
22 Cr. 615 (LGS)

Dear Judge Schofield:

We represent Defendant Liaquat Cheema ("Cheema") in this action. We write to respectfully request an adjournment of Mr. Cheema's sentencing, which is currently scheduled for July 8, 2024, and extensions of time for the parties' sentencing submissions, and for the deadline for disclosure of the updated Presentence Report.

Pursuant to the Plea Agreement, Mr. Cheema is required to make a forfeiture payment of \$2,500,000 on or before his sentencing date.

With the Government's knowledge, Mr. Cheema is in the process of selling property to satisfy this forfeiture obligation.

We therefore respectfully request that Mr. Cheema's sentencing date be adjourned from July 8, 2024 to a date convenient to the Court in September, after the Labor Day holiday, to give the defendant time to be able to make this forfeiture payment.

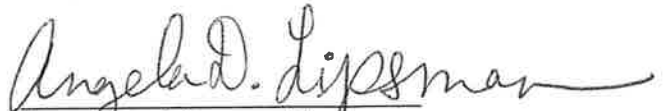
We also respectfully request that the deadlines for the parties' sentencing submissions be adjusted accordingly.

Additionally, we have been advised by the Probation Department that the revised Presentence Report is currently due on May 24, 2024. Out of an abundance of caution, we are requesting that the Probation Department's deadline for submitting the updated Presentence Report be extended by 45 days. This should permit the defendant's financial disclosure form and the final Presentence Report to incorporate the sale of property.

We have communicated with the Government and with the Probation Department and understand that they have no objection to this application.

Thank you for your consideration.

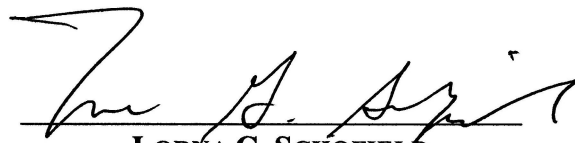
Respectfully submitted,


Angela D. Lipsman, Esq.
Joseph R. Corozzo, Esq.

cc: Assistant United States Attorney Timothy Capozzi (via ECF)
Probation Officer Stephanie McMahon (via email)

Application Granted. Defendant Liaquat Cheema's sentencing hearing currently scheduled for July 8, 2024, is adjourned to **September 16, 2024, at 11:00 a.m.** Defendant's sentencing submission shall be filed by **August 26, 2024**. The Government's sentencing submission shall be filed by **August 29, 2024**. The Probation Department's revised Presentence Report shall be completed by **August 1, 2024**. The Clerk of the Court is directed to terminate the letter motion at docket number 96.

Dated: May 7, 2024.
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE